

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

JOHN COSTANZO JR. and  
MANUEL RECIO,

Defendants.

Case No. 22 Cr. 281 (JPO)

**DEFENDANTS JOHN COSTANZO JR. AND MANUEL RECIO'S MOTION IN LIMINE  
REGARDING FEDERAL RULE OF EVIDENCE 801(d)(2)(E) STATEMENTS**

Pursuant to Federal Rules of Evidence 104 and 801(d)(2)(E), John Costanzo Jr. and Manuel Recio respectfully move to preclude the government from offering in evidence the statements of declarants Jorge Luis Villazon Hernandez, Luis Guerra, David Macey, and Edwin Pagan.

In support, John Costanzo Jr. and Mr. Recio respectfully submit the accompanying supporting Memorandum of Law and Declaration of Amber Donner.

Dated: September 27, 2023  
New York, New York

Respectfully submitted,

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